

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

**Case No. 1:22-cv-00125**

**Hon. Matthew F. Kennelly**

**DECLARATION OF EDWARD NORMAND IN SUPPORT OF MOTION FOR CLASS  
CERTIFICATION AND MOTION TO EXCLUDE THE TESTIMONY OF  
DEFENDANTS' EXPERT DR. LONG AND PETER AMMON**

I, Edward Normand, duly sworn, do hereby depose and say as follows:

1. I am a Partner at the law firm Freedman Normand Friedland LLP, counsel for Plaintiffs.

2. I am fully familiar with the facts and circumstances set forth herein, and I make this declaration in support of Plaintiffs' Motion for Class Certification and Motions to Exclude the Testimony of Defendants' Expert Dr. Bridget Terry Long and Mr. Peter Ammon.

3. Attached as Exhibit 1 is a true and correct copy of CORNELL\_LIT0000015955, Felton Deposition Exhibit. 7, dated October 14, 2020.

4. Attached as Exhibit 2 is a true and correct copy of CORNELL\_LIT0000018801, dated January 28, 2016.

5. Attached as Exhibit 3 is a true and correct copy of CORNELL\_LIT0000162302, Felton Deposition Exhibit 24., dated October 28, 2009.

6. Attached as Exhibit 4 is a true and correct copy of CORNELL\_LIT0000170204, dated October 8, 2010.

7. Attached as Exhibit 5 is a true and correct copy of CORNELL\_LIT0000301012, dated December 21, 2012.

8. Attached as Exhibit 6 is a true and correct copy of DARTMOUTH\_0000380953, dated February 23, 2022.

9. Attached as Exhibit 7 is a true and correct copy of DARTMOUTH\_0000359371, dated November 28, 2005.

10. Attached as Exhibit 8 is a true and correct copy of DUKE568\_0029589, dated April 22, 2021.

11. Attached as Exhibit 9 is a true and correct copy of DUKE568-0067132, dated April 19, 2017.

12. Attached as Exhibit 10 is a true and correct copy of Emory\_568Lit\_0000577, dated February 23, 2009.

13. Attached as Exhibit 11 is a true and correct copy of Emory\_568Lit\_0002702, dated February 21, 2012.

14. Attached as Exhibit 12 is a true and correct copy of Emory\_568Lit\_0003643, dated February 21, 2012.

15. Attached as Exhibit 13 is a true and correct copy of EMORY\_568Lit\_0006148, dated April 18, 2012.

16. Attached as Exhibit 14 is a true and correct copy of GTWNU\_0000000241, dated June 4, 2019.

17. Attached as Exhibit 15 is a true and correct copy of GTWNU\_0000000278.

18. Attached as Exhibit 16 is a true and correct copy of GTWNU\_0000116894, dated February 2, 2012.

19. Attached as Exhibit 17 is a true and correct copy of GTWNU\_0000193182, McWade Exhibit 11, dated April 15, 2014.

20. Attached as Exhibit 18 is a true and correct copy of MITLIT-000074274, Bridson MIT 30(b)(6) Ex. 02, dated August 27, 2014.

21. Attached as Exhibit 19 is a true and correct copy of MITLIT-000089375, Millard Ex. 7, dated November 13, 2016.

22. Attached as Exhibit 20 is a true and correct copy of MITLIT-000117897, I. Waitz Deposition Exhibit 5, dated December 1, 2019.

23. Attached as Exhibit 21 is a true and correct copy of MITLIT-000637360 , Hicks Ex. 11, dated October 17, 2014.

24. Attached as Exhibit 22 is a true and correct copy of MITLIT-000659292, S. Schmill Deposition Exhibit 29, dated December 22, 2018.

25. Attached as Exhibit 23 is a true and correct copy of ND\_0039910, dated December 11, 2019.

26. Attached as Exhibit 24 is a true and correct copy of ND\_0196410, Malloy Deposition Exhibit 12., dated March 6, 2012.

27. Attached as Exhibit 25 is a true and correct copy of ND\_0199458.

28. Attached as Exhibit 26 is a true and correct copy of ND\_0260818, dated October 5, 2016.

29. Attached as Exhibit 27 is a true and correct copy of ND\_0337024, dated April 1, 2016.

30. Attached as Exhibit 28 is a true and correct copy of NULIT-0000159158, M. Schapiro Deposition Exhibit 7, dated November 30, 2017.

31. Attached as Exhibit 29 is a true and correct copy of NULIT-0000159161, Watson Deposition Exhibit. 03, dated December 1, 2017.

32. Attached as Exhibit 30 is a true and correct copy of NULIT-0000169374, M. Schapiro Deposition Exhibit 6, dated December 4, 2013.

33. Attached as Exhibit 31 is a true and correct copy of NULIT-0000169661, Watson Deposition Exhibit. 10, dated May 5, 2017.

34. Attached as Exhibit 32 is a true and correct copy of NULIT-0000178661, Watson Deposition Exhibit 07, dated April 25, 2012.

35. Attached as Exhibit 33 is a true and correct copy of PENN568-LIT-00016120.

36. Attached as Exhibit 34 is a true and correct copy of PENN568-LIT-00017761.

37. Attached as Exhibit 35 is a true and correct copy of PENN568-LIT-00137113, Varas Deposition Exhibit 17, dated January 17, 2019.

38. Attached as Exhibit 36 is a true and correct copy of PENN568-LIT-00178393, dated May 10, 2018.

39. Attached as Exhibit 37 is a true and correct copy of VANDERBILT-00026768.

40. Attached as Exhibit 38 is a true and correct copy of VANDERBILT-00047310, Tener Deposition Exhibit 03, dated August 24, 2014.

41. Attached as Exhibit 39 is a true and correct copy of the J. DeGioia Deposition Exhibit 8, dated June 25, 2023.

42. Attached as Exhibit 40 is a true and correct copy of the J. DeGioia Deposition Exhibit 13, dated March 6, 2014.

43. Attached as Exhibit 41 is a true and correct copy of GTWNU\_0000094409, C. Deacon Deposition Exhibit 6, dated July 9, 2021.

44. Attached as Exhibit 42 is a true and correct copy of GTWNU\_0000170064, C. Deacon Deposition Exhibit 5.

45. Attached as Exhibit 43 is a true and correct copy of GTWNU\_0000170083, C. Deacon Deposition Exhibit 4.

46. Attached as Exhibit 44 is a true and correct copy of GTWNU\_0000170128, C. Deacon Deposition Exhibit 3.

47. Attached as Exhibit 45 is a true and correct copy of GTWNU\_0000170277, C. Deacon Deposition Exhibit 2.

48. Attached as Exhibit 46 is a true and correct copy of GTWNU\_0000170284, C. Deacon Deposition Exhibit 1.

49. Attached as Exhibit 47 is a true and correct copy of GTWNU\_0000374005, J. DeGioia Deposition Exhibit 12, dated March 8, 2019.

50. Attached as Exhibit 48 is a true and correct copy of GTWNU\_0000374050, J. DeGioia Deposition Exhibit 7, dated March 15, 2017.

51. Attached as Exhibit 49 is a true and correct copy of GTWNU\_0000378237, DeGioia Exhibit 06.

52. Attached as Exhibit 50 is a true and correct copy of GTWNU\_00397672, J. DeGioia Deposition Exhibit 36, dated. August 29, 2018

53. Attached as Exhibit 51 is a true and correct copy of GTWNU\_00398987, J. DeGioia Deposition Exhibit 37, dated December 13, 2018.

54. Attached as Exhibit 52 is a true and correct copy of GTWNU\_00399820, J. DeGioia Deposition Exhibit 38, dated February 25, 2019.

55. Attached as Exhibit 53 is a true and correct copy of GTWNU\_00399824, J. DeGioia Deposition Exhibit 40, dated April 2, 2019.

56. Attached as Exhibit 54 is a true and correct copy of GTWNU\_00400057, J. DeGioia Deposition Exhibit 39, dated February 11, 2019.

57. Attached as Exhibit 55 is a true and correct copy of GTWNU\_00415241, J. DeGioia Deposition Exhibit 9, dated August 24, 2019.

58. Attached as Exhibit 56 is a true and correct copy of GTWNU\_00416435, J. DeGioia Deposition Exhibit 41, dated December 2, 2020.

59. Attached as Exhibit 57 is a true and correct copy of Schapiro Exhibit 03, dated February 22., 2001.

60. Attached as Exhibit 58 is a true and correct copy of excerpts taken from the Transcript of the A. Koenig deposition, dated February 13, 2024.

61. Attached as Exhibit 59 is a true and correct copy of excerpts taken from the Transcript of the P. Ammon deposition.

62. Attached as Exhibit 60 is a true and correct copy of excerpts taken from the Transcript of the C. Deacon deposition, dated May 18, 2022.

63. Attached as Exhibit 61 is a true and correct copy of excerpts taken from the Transcript of the C. Watson deposition, dated October 10, 2023.

64. Attached as Exhibit 62 is a true and correct copy of excerpts taken from the Transcript of the D. Bishop deposition, dated August 16, 2024.

65. Attached as Exhibit 63 is a true and correct copy of the excerpts taken from the Transcript of the D. Christiansen deposition, dated December 1, 2023.

66. Attached as Exhibit 64 is a true and correct copy of excerpts taken from the Transcript of the H. Singer deposition, dated November 27, 2024.

67. Attached as Exhibit 65 is a true and correct copy of excerpts taken from the Transcript of the I. Waitz deposition, dated December 15, 2023.

68. Attached as Exhibit 66 is a true and correct copy of excerpts taken from the Transcript of the J. Locke, dated December 11, 2023.

69. Attached as Exhibit 67 is a true and correct copy of excerpts taken from the Transcript of the J. Sassorossi deposition, dated May 17, 2023.

70. Attached as Exhibit 68 is a true and correct copy of excerpts taken from the Transcript of the of J. Tilton deposition, dated May 15, 2023.

71. Attached as Exhibit 69 is a true and correct copy of excerpts taken from the Transcript of the L. Stiroh Deposition, dated November 12, 2024.

72. Attached as Exhibit 70 is a true and correct copy of excerpts taken from the Transcript of the M. Hall deposition, dated September 13, 2023.

73. Attached as Exhibit 71 is a true and correct copy of excerpts taken from the Transcript of the M. Schapiro deposition, dated July 18, 2023.

74. Attached as Exhibit 72 is a true and correct copy of excerpts taken from the Transcript of the N. Hill deposition, dated November 22, 2024.

75. Attached as Exhibit 73 is a true and correct copy of excerpts taken from the Transcript of the P. McWade deposition, dated December 8, 2023.

76. Attached as Exhibit 74 is a true and correct copy of excerpts taken from the Transcript of the R. Millard deposition, dated February 27, 2024.

77. Attached as Exhibit 75 is a true and correct copy of excerpts taken from the Transcript of the S. Donahue deposition, dated March 26, 2024.

78. Attached as Exhibit 76 is a true and correct copy of excerpts taken from the Transcript of the S. Harberson deposition, dated October 25, 2023.

79. Attached as Exhibit 77 is a true and correct copy of excerpts taken from the Transcript of the S. Schmill deposition, dated June 5, 2024.

80. Attached as Exhibit 78 is a true and correct copy of an excerpt from the Transcript of the S. Baum deposition, dated March 29, 2024.

81. Attached as Exhibit 79 is a true and correct copy of UCHICAGO\_0000052966, dated.

82. Attached as Exhibit 80 is a true and correct copy of the Transcript of D. Betterton deposition, dated February 22, 2024.

83. Attached as Exhibit 81 is a true and correct copy of Emory\_568Lit\_0023692.

84. Attached as Exhibit 82 is a true and correct copy of Columbia\_00246836, dated October 14, 2014.



85. Attached as Exhibit 83 is a true and correct copy of Columbia\_00056363, dated April 25, 2011.

86. Attached as Exhibit 84 is a true and correct copy of *University Leaves Financial Aid Group*, YALE DAILY NEWS, by Caitlin Roman, dated September 26, 2008.

87. Attached as Exhibit 85 is a true and correct copy of CALTECH000054902.

88. Attached as Exhibit 86 is a true and correct copy of an excerpt from the Transcript of the J. DeGioia deposition, dated February 16, 2024.

89. Attached as Exhibit 87 is a true and correct copy of CORNELL\_LIT0000206598, dated October 29, 2015.

90. Attached as Exhibit 88 is a true and correct copy of *Penn Expands Financial Aid for Middle Income Families*, by Penn Today, dated November. 19, 2024.

91. Attached as Exhibit 89 is a true and correct copy of *Undergraduates with Family Income Below \$200,000 Can Expect to Attend MIT Tuition-free Starting in 2025*, by Steve Brandt, of MIT News, dated November 20, 2024.

92. Attached as Exhibit 90 is a true and correct copy of *Dartmouth Receives Its Largest-Ever Scholarship Bequest*, by Dartmouth: Office of Communications, dated March 25, 2024.

93. Attached as Exhibit 91 is a true and correct copy of *Transforming Higher Education: Notre Dame's Bold, Landmark Commitment to Financial Aid*, by Sean Cuneo, dated September 19, 2024.

94. Attached as Exhibit 92 is a true and correct copy of *Vanderbilt University Announces Expansion of Its No-Loan Financial Aid*, by Vanderbilt University News, dated February 8, 2024.

95. Attached as Exhibit 93 is a true and correct copy of *Financial Aid Office Announces Three New Efforts to Streamline Process*, by Molly Reinmann, of Yale Daily News, dated November 13, 2023.

96. Attached as Exhibit 94 is a true and correct copy of Vanderbilt-00403762-Christianson Exhibit 7, dated February 15, 2023.

97. Attached as Exhibit 95 is a true and correct copy of the Notre Dame 568 Stipulation, dated October 4, 2023.

98. Attached as Exhibit 96 is a true and correct copy of the NU Donor Stipulation, dated October 13, 2023.

99. Attached as Exhibit 97 is a true and correct copy of Vanderbilt Stipulation, dated November 3, 2023.

100. Attached as Exhibit 98 is a true and correct copy of the DeGioia Deposition Exhibit 1, dated September 9, 2015.

101. Attached as Exhibit 99 is a true and correct copy of the Crowley Deposition Exhibit 8, dated March 13, 2019.

102. Attached as Exhibit 100 is a true and correct copy of GTWNU\_0000146786-Deacon Exhibit 33., dated May 13, 2014.

103. Attached as Exhibit 101 is a true and correct copy of the Transcript for the J. Gaines deposition, dated August 3, 2023.

104. Attached as Exhibit 102 is a true and correct copy of GTWNU\_0000146786, dated November 5, 2002.

105. Attached as Exhibit 103 is a true and correct copy of Penn's Response and Objections to Plaintiffs' First Set of Request for Admission to All Defendants, RFA No. 20, dated November 13, 2023

106. Attached as Exhibit 104 is a true and correct copy of *Penn paid Amy Gutmann \$23 million in final year as president, including 18-year compensation package*, by Jared Mitovich of The Daily Pennsylvanian, dated June 17, 2023.

107. Attached as Exhibit 105 is a true and correct copy of NULIT-0000161662.

108. Attached as Exhibit 106 is a true and correct copy of CORNELL\_LIT0000002448., dated December 1, 2003.

109. Attached as Exhibit 107 is a true and correct copy of DUKE568\_0000027, McCall Exhibit 14., dated December, 2016.

110. Attached as Exhibit 108 is a true and correct copy of the Expert Report of Hal Singer dated May 14, 2024.

111. Attached as Exhibit 109 is a true and correct copy of the Expert Report of Elizabeth Mora dated May 14, 2024.

112. Attached as Exhibit 110 is a true and correct copy of the Rebuttal Expert Report of Hal Singer dated October 7, 2024.

113. Attached as Exhibit 111 is a true and correct copy of the Rebuttal Expert Report of Elizabeth Mora dated October 7, 2024.

114. Attached as Exhibit 112 is a true and correct copy of the Expert Report of George Bulman dated May 14, 2024.

115. Attached as Exhibit 113 is a true and correct copy of the Rebuttal Expert Report of George Bulman dated October 7, 2024.

116. Attached as Exhibit 114 is a true and correct copy of the Suppl. Rebuttal Expert Report of Hal Singer Ph. D dated November 8, 2024.

117. Attached as Exhibit 115 is a true and correct copy of the Expert Report of Terry Bridget Long Ph. D dated August 7, 2024 (omitting Appendix D for potential confidentiality issues).

118. Attached as Exhibit 116 is a true and correct copy of excerpts from the Transcript of the B.T. Long deposition, dated October 23, 2024.

119. Attached as Exhibit 117 is a true and correct copy of *Major financial aid expansion at Penn targets middle-income families, excludes home values*, by Neema Baddam of The Daily Pennsylvanian, dated November 19, 2024.

120. Attached as Exhibit 118 is a true and correct copy of ND\_0065243, Nucciarone Deposition Exhibit 03, dated July 9, 2015.

121. Attached as Exhibit 119 is a true and correct copy of excerpts from the Transcript M. Nucciarone 30(b)(6), dated April 3, 2024.

122. Attached as Exhibit 120 is a true and correct copy of excerpts from the Transcript of J. O'Neill deposition, dated August 17, 2023.

123. Attached as Exhibit 121 is a true and correct copy of YALE\_LIT\_0000321580.

124. Attached as Exhibit 122 is a true and correct copy of the Expert Report of Peter Ammon, dated August 7, 2024.

125. Attached as Exhibit 123 is a true and correct copy of PENN568-LIT-000000002, dated January 24, 2020.

Dated: December 16, 2024

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/ Edward Normand  
Edward Normand  
**FREEDMAN NORMAND  
FRIEDLAND LLP**  
10 Grand Central  
155 E. 44th Street, Suite 915  
New York, NY 10017  
Tel: 646-350-0527  
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**Appendix 1: Exhibit Mapping**

<b>Ex. No.</b>	<b>Document ID</b>	<b>Transcript Pincites</b>	<b>Cited in Expert Report ¶</b>
<b>1</b>	CORNELL_LIT0000015955 - Felton Ex. 7		
<b>2</b>	CORNELL_LIT0000018799 at -801		
<b>3</b>	CORNELL_LIT0000162302 - Felton Ex. 24		
<b>4</b>	CORNELL_LIT0000170204		
<b>5</b>	CORNELL_LIT0000301012		
<b>6</b>	DARTMOUTH_0000380953		
<b>7</b>	DARTMOUTH_0000359371		Singer ¶ 126, 162, 298, 299, 300 Singer Rebuttal ¶ 42, 258, 264 Long ¶ 184
<b>8</b>	DUKE568_0029588 at -89		
<b>9</b>	DUKE568-0067132		
<b>10</b>	Emory_568Lit_0000577		Singer ¶ 126, 147 Singer Rebuttal ¶ 38
<b>11</b>	Emory_568Lit_0002702		
<b>12</b>	Emory_568Lit_0003643		
<b>13</b>	EMORY_568Lit_0006148		
<b>14</b>	GTWNU_0000000241		
<b>15</b>	GTWNU_0000000278		Singer ¶ 309
<b>16</b>	GTWNU_0000116894		
<b>17</b>	GTWNU_0000193182 - McWade Exhibit 11		
<b>18</b>	MITLIT-000074274 - Bridson - MIT 30(b)(6) Ex. 02		Singer ¶ 147, 379, 380, 381 Singer Rebuttal ¶ 267
<b>19</b>	MITLIT-000089375 - Millard Ex. 07		
<b>20</b>	MITLIT-000117897 - I. Waitz Deposition Exhibit 5		
<b>21</b>	MITLIT-000637360 - Hicks Ex. 11		
<b>22</b>	MITLIT-000659292 - S. Schmill Deposition Exhibit 29		
<b>23</b>	ND_0039910		
<b>24</b>	ND_0196410 - Malloy Ex. 12		
<b>25</b>	ND_0199458		

<b>Ex. No.</b>	<b>Document ID</b>	<b>Transcript Pincites</b>	<b>Cited in Expert Report ¶</b>
<b>26</b>	ND_0260818		
<b>27</b>	ND_0337024		
<b>28</b>	NULIT-0000159158 - M. Schapiro Deposition Exhibit 7		
<b>29</b>	NULIT-0000159161 - Watson Ex. 03		
<b>30</b>	NULIT-0000169374 - M. Schapiro Deposition Exhibit 6		
<b>31</b>	NULIT-0000169661 - Watson Ex. 10		
<b>32</b>	NULIT-0000178661 - Watson Ex. 07		
<b>33</b>	PENN568-LIT-00016120		Singer ¶ 158, 355
<b>34</b>	PENN568-LIT-00017779		Singer ¶ 355
<b>35</b>	PENN568-LIT-00137113 - Varas Ex. 17		
<b>36</b>	PENN568-LIT-00178393		
<b>37</b>	VANDERBILT-00026768		
<b>38</b>	VANDERBILT-00047310 - Tener Ex. 03		Singer ¶ 130 Singer Rebuttal ¶ 57
<b>39</b>	J. DeGioia Deposition Exhibit 8		
<b>40</b>	J. DeGioia Deposition Exhibit 13		Singer ¶ 308 Singer Rebuttal ¶ 273
<b>41</b>	GTWNU_0000094409 - C. Deacon Deposition Exhibit 6		
<b>42</b>	GTWNU_0000170064 - C. Deacon Deposition Exhibit 5		
<b>43</b>	GTWNU_0000170083 - C. Deacon Deposition Exhibit 4		
<b>44</b>	GTWNU_0000170128 - C. Deacon Deposition Exhibit 3		
<b>45</b>	GTWNU_0000170277 - C. Deacon Deposition Exhibit 2		
<b>46</b>	GTWNU_0000170284 - C. Deacon Deposition Exhibit 1		
<b>47</b>	GTWNU_0000374005 - J. DeGioia Deposition Exhibit 12		
<b>48</b>	GTWNU_0000374050 - J. DeGioia Deposition Exhibit 7		
<b>49</b>	GTWNU_0000378237 - DeGioia Exhibit 06		

<b>Ex. No.</b>	<b>Document ID</b>	<b>Transcript Pincites</b>	<b>Cited in Expert Report ¶</b>
<b>50</b>	GTWNU_00397672 - J. DeGioia Deposition Exhibit 36		
<b>51</b>	GTWNU_00398987 - J. DeGioia Deposition Exhibit 37		
<b>52</b>	GTWNU_00399820 - J. DeGioia Deposition Exhibit 38		
<b>53</b>	GTWNU_00399824 - J. DeGioia Deposition Exhibit 40		
<b>54</b>	GTWNU_00400057 - J. DeGioia Deposition Exhibit 39		
<b>55</b>	GTWNU_00415241 - J. DeGioia Deposition Exhibit 9		
<b>56</b>	GTWNU_00416435 - J. DeGioia Deposition Exhibit 41		
<b>57</b>	Schapiro Exhibit 03		
<b>58</b>	Transcript excerpt of A. Koenig deposition, dated February 13, 2024	25:13-27:11; 26:19-27:11, 27:12-28:23; 33:5-36:16, 208:6-209:5;	
<b>59</b>	Transcript of P. Ammon deposition, dated	115:5-7 115:8-16 117:15-23 118:21-119:3 119:5-10 193:25-194:5	
<b>60</b>	Transcript excerpt of C. Deacon DOJ deposition, dated May 18, 2022	91:12-23	
<b>61</b>	Transcript excerpt of C. Watson deposition, dated October 10, 2023	40:3-8; 60:7-9, 62:9-15, 68:21-25	
<b>62</b>	Transcript excerpt of D. Bishop deposition, dated August 16, 2024	302:21-303:1	
<b>63</b>	Transcript excerpt of D. Christiansen deposition, dated December 1, 2023	61:16-63:3	
<b>64</b>	Transcript excerpt of H. Singer deposition, dated November 27, 2024	47:13-48:10; 50:3-51:4; 192:9-193:5;	
<b>65</b>	Transcript excerpt of I. Waitz deposition, dated December 15, 2023	110:19-21; 113:16-23	
<b>66</b>	Transcript excerpt of J. Locke, dated December 11, 2023	178:11-180:10, 203:9-204:17	



<b>Ex. No.</b>	<b>Document ID</b>	<b>Transcript Pincites</b>	<b>Cited in Expert Report ¶</b>
<b>67</b>	Transcript excerpt of J. Sassorossi deposition, dated May 17, 2023	45:5-16, 51:2-24, 52:6-53:13, 55:3-56:13; 58:15-20; 130:8-131:2; 163:7-8; 165:20-167:16; 169:8-170:2, 171:18-172:25; 175:16-178:12; 179:18-180:5; 181:8-182:3; 182:21-183:6; 198:15-20; 217:13-24; 220:3-21 233:16-234:5; 242:5-243:12; 250:25-251:13; 290:7-292:16; 297:11-298:19; 295:20-297:10	
<b>68</b>	Transcript excerpt of J. Tilton deposition, dated May 15, 2023	191:6-17	
<b>69</b>	Transcript excerpt of L. Stiroh deposition, dated November 12, 2024	149:17-24; 176:15-23; 185:19-25, 190:25-191:9	
<b>70</b>	Transcript excerpt of M. Hall deposition, dated September 13, 2023	55:15-22	
<b>71</b>	Transcript excerpt of M. Schapiro deposition, dated July 18, 2023	39:12-40:8; 42:19-43:12; 45:3-46:3; 47:9-48:20; 53:2-5; 53:8-9; 61:18-25	
<b>72</b>	Transcript excerpt of N. Hill deposition, dated November 22, 2024	92:23-93:6	
<b>73</b>	Transcript excerpt of P. McWade deposition, dated December 8, 2023	106:10-14; 190:18-191:4	Singer ¶ 309 Singer Rebuttal ¶ 273
<b>74</b>	Transcript excerpt of R. Millard deposition, dated February 27, 2024	57:13-58:11	
<b>75</b>	Transcript excerpt of S. Donahue deposition, dated March 26, 2024	56:4-15	Singer ¶ 379
<b>76</b>	Transcript excerpt of S. Harberson deposition, dated October 25, 2023	223:6-9; 224:17-225-12	

<b>Ex. No.</b>	<b>Document ID</b>	<b>Transcript Pincites</b>	<b>Cited in Expert Report ¶</b>
<b>77</b>	Transcript excerpt of S. Schmill deposition, dated June 5, 2024	233:10-234:3; 239:12-15	
<b>78</b>	Transcript excerpt of S. Baum deposition, dated March 29, 2024	106:9-15; 172:3-13	Singer ¶ (passim)
<b>79</b>	UCHICAGO_0000052966		Singer ¶ 224, 342 Singer Rebuttal ¶ 57
<b>80</b>	Transcript excerpt of D. Betterton deposition, dated February 22, 2024	17:20-18:11	Singer ¶ 226, 380
<b>81</b>	Emory_568Lit_0023692		Singer ¶ 225, 349
<b>82</b>	Columbia_00246836		Singer ¶ 84, 224, 342
<b>83</b>	Columbia_00056363		Singer ¶ 226, 379, 380 Singer Rebuttal ¶ 57
<b>84</b>	Caitlin Roman, University Leaves Financial Aid Group, YALE DAILY NEWS (Sept. 26, 2008), <a href="https://yaledailynews.com/blog/2008/09/26/university-leaves-financial-aid-group/">https://yaledailynews.com/blog/2008/09/26/university-leaves-financial-aid-group/</a> .		Singer ¶ 222
<b>85</b>	CALTECH000054902		
<b>86</b>	Transcript excerpt of J. DeGioia deposition, dated February 16, 2024	50:15-23; 50:15-51:18; 65:11-66:24; 67:2-6; 95:6-96:9; 254:23-256:10; 255:23-256:14	
<b>87</b>	CORNELL_LIT0000206598		
<b>88</b>	<i>Penn Expands Financial Aid for Middle Income Families</i> , PennToday (Nov. 19, 2024)		
<b>89</b>	Steve Brandt, <i>Undergraduates with Family Income Below \$200,000 Can Expect to Attend MIT Tuition-free Starting in 2025</i> , MIT News (Nov. 20, 2024).		
<b>90</b>	<i>Dartmouth Receives Its Largest-Ever Scholarship Bequest</i> , Dartmouth: Office of Communications (Mar. 25, 2024)		
<b>91</b>	Sean Cuneo, <i>Transforming Higher Education: Notre Dame's Bold, Landmark Commitment to Financial Aid</i> , Giving to Notre Dame (Sept. 19, 2024)		

<b>Ex. No.</b>	<b>Document ID</b>	<b>Transcript Pincites</b>	<b>Cited in Expert Report ¶</b>
<b>92</b>	<i>Vanderbilt University Announces Expansion of Its No-Loan Financial Aid</i> , Vanderbilt University News (Feb. 8, 2024)		
<b>93</b>	Molly Reinmann, <i>Financial Aid Office Announces Three New Efforts to Streamline Process</i> , Yale Daily News (Nov. 13, 2023)		
<b>94</b>	Vanderbilt-00403761		
<b>95</b>	Stipulation Between Plaintiffs and Defendant Notre Dame Du Lac regarding Donor-Related Admissions and the 568 Exemption, dated October 4, 2023		
<b>96</b>	Stipulation Between Plaintiffs and Defendant Northwestern University, dated October 13, 2023		
<b>97</b>	Stipulation Between Plaintiffs and Defendant Vanderbilt University, dated November 3, 2023		
<b>98</b>	J. DeGioia Deposition Exhibit 1		
<b>99</b>	Crowley Dep Ex 8 - <a href="https://www.bostonglobe.com/opinion/editorials/2019/03/13/confessions-former-admissions-director/qPQppf0AhpJIbIJ8mZ6q9L/story.html">https://www.bostonglobe.com/opinion/editorials/2019/03/13/confessions-former-admissions-director/qPQppf0AhpJIbIJ8mZ6q9L/story.html</a>		
<b>100</b>	GTWNU_0000146786 - Deacon Exhibit 33		
<b>101</b>	Transcript excerpt of J. Gaines deposition, dated August 3, 2023	53:20-22, 54:23-55:1	
<b>102</b>	CORNELL_LIT0000303597		Singer ¶ 142-146
<b>103</b>	Penn Response to RFA No. 20, Penn's Response and Objections to Plaintiffs' First Set of Request for Admission to All Defendants, dated November 13, 2023,		
<b>104</b>	Jared Mitovich, <i>Penn Paid Amy Gutmann \$23 Million in Final Year as President, Including 18-Year Compensation Package</i> , Daily Pennsylvanian (June 17, 2023, 1:16		

<b>Ex. No.</b>	<b>Document ID</b>	<b>Transcript Pincites</b>	<b>Cited in Expert Report ¶</b>
	PM), <a href="https://www.thedp.com/article/2023/06/penn-amy-gutmann-university-president-salary">https://www.thedp.com/article/2023/06/penn-amy-gutmann-university-president-salary</a>		
<b>105</b>	NULIT-0000161662		Long ¶ 176 (passim)
<b>106</b>	CORNELL_LIT0000002448		Singer ¶ 131, 135,137,163, 182 Singer Rebuttal ¶ 258
<b>107</b>	DUKE568_0000027 - McCall Ex. 14		Singer ¶ 160
<b>108</b>	Expert Report of H. Singer, dated May 14, 2024		
<b>109</b>	Expert Report of E. Mora, dated May 14, 2024		
<b>110</b>	Expert Rebuttal Report of H. Singer, dated October 7, 2024		
<b>111</b>	Expert Rebuttal Report of E. Mora, dated October 7, 2024		
<b>112</b>	Expert Report of G. Bulman, dated May 14, 2024		
<b>113</b>	Expert Rebuttal Report of G. Bulman, dated October 7, 2024		
<b>114</b>	Expert Supplemental Rebuttal Report of H. Singer, dated November 8, 2024.		
<b>115</b>	Expert Report of B. Long, dated August 7, 2024		
<b>116</b>	Transcript excerpt of B.T. Long deposition, dated October 23, 2024	13:15-21; 14:18-22; 15:4-18; 23:45-24:18; 26:8-27:12; 27:1-7; 38:22-39:4; 38:18-42:9; 39:6-9; 39:10-16; 39:17-42:9; 40:5-10; 42:7-9; 71:11-22; 71:18-22; 102:7-12; 103:13-105:10; 103:18-21; 105:6-10; 109:8-110:21; 111:23-112:4; 112:19-23; 112:24-113:8; 119:2-6; 119:2-16; 119:20-	

Ex. No.	Document ID	Transcript Pincites	Cited in Expert Report ¶
		120:1; 125:2-6; 143:23-144:2	
117	Neema Baddam, <i>Major Financial Aid Expansion at Penn Targets Middle-Income Families, Excludes Home Values</i> , Daily Pennsylvanian (Nov. 19, 2024)		
118	ND_0065243 - Nucciarone Ex. 03		Singer ¶ 325 Singer rebuttal ¶ 277
119	Transcript of M. Nucciarone Rule 30(b)(6) deposition, dated April 3, 2024	39:24-40, 230:10-22	Singer ¶ 325 Singer Rebuttal ¶ 268
120	Transcript Excerpts of J. O'Neill deposition, dated August 17, 2023	52:2-24; 53:9-24.	
121	YALE_LIT_0000321580.pdf		
122	Peter Ammon Rule 26(a)(2)(C) Disclosure, dated August 7, 2024		
123	PENN568-LIT-00000002.		

Table of Singer Report Exhibits

Ex. No.	Document ID	Transcript Pincites	Cited in Expert Report ¶
7	DARTMOUTH_0000359371		Singer ¶ 126, 162, 298, 299, 300
10	Emory_568Lit_0000577		Singer ¶ 126, 147
15	GTWNU_0000000278		Singer ¶ 309
18	MITLIT-000074274 - Bridson - MIT 30(b)(6) Ex. 02		Singer ¶ 147, 379, 380, 381
33	PENN568-LIT-00016120		Singer ¶ 158, 355
34	PENN568-LIT-00017761		Singer ¶ 355
38	VANDERBILT-00047310 - Tener Ex. 03		Singer ¶ 130
40	J. Deposition Exhibit 13		Singer ¶ 308
73	Transcript excerpt of P. McWade deposition, dated December 8, 2023	106:10-14; 190:18-191:4	Singer ¶ 309
75	Transcript excerpt of S. Donahue deposition, dated March 26, 2024	56:4-15	Singer ¶ 379
78	Transcript excerpt of S. Baum deposition, dated March 29, 2024	106:9-15; 172:3-13	Singer ¶ (passim)
79	UCHICAGO_0000052966		Singer ¶ 224, 342

<b>80</b>	Transcript excerpt of D. Betterton deposition, dated February 22, 2024	17:20-18:11	Singer ¶ 226, 380
<b>81</b>	Emory_568Lit_0023692		Singer ¶ 225, 349
<b>82</b>	Columbia_00246836		Singer ¶ 84, 224, 342
<b>83</b>	Columbia_00056363		Singer ¶ 226, 379, 380
<b>84</b>	Caitlin Roman, University Leaves Financial Aid Group, YALE DAILY NEWS (Sept. 26, 2008), <a href="https://yaledailynews.com/blog/2008/09/26/university-leaves-financial-aid-group/">https://yaledailynews.com/blog/2008/09/26/university-leaves-financial-aid-group/</a> .		Singer ¶ 222
<b>102</b>	CORNELL_LIT0000303597		Singer ¶ 142-146
<b>106</b>	CORNELL_LIT0000002448		Singer ¶ 131, 135, 137, 163, 182
<b>107</b>	DUKE568_0000027 - McCall Ex. 14		Singer ¶ 160
<b>118</b>	ND_0065243 - Nucciarone Ex. 03		Singer ¶ 325
<b>119</b>	Transcript of M. Nucciarone Rule 30(b)(6) deposition, dated April 3, 2024	39:24-40, 230:10-22	Singer ¶ 325

Table of Singer Rebuttal Report Exhibits

<b>Ex. No.</b>	<b>Document ID</b>	<b>Transcript Pincites</b>	<b>Cited in Expert Report ¶</b>
<b>7</b>	DARTMOUTH_0000359371		Singer Rebuttal ¶ 42, 258, 264
<b>10</b>	Emory_568Lit_0000577		Singer Rebuttal ¶ 38
<b>18</b>	MITLIT-000074274 - Bridson - MIT 30(b)(6) Ex. 02		Singer Rebuttal ¶ 267
<b>38</b>	VANDERBILT-00047310 - Tener Ex. 03		Singer Rebuttal ¶ 57
<b>40</b>	J. DeGioia Deposition Exhibit 13		Singer Rebuttal ¶ 273
<b>73</b>	Transcript excerpt of P. McWade deposition, dated December 8, 2023	106:10-14; 190:18-191:4	Singer Rebuttal ¶ 273
<b>79</b>	UCHICAGO_0000052966		Singer Rebuttal ¶ 57
<b>83</b>	Columbia_00056363		Singer Rebuttal ¶ 57
<b>106</b>	CORNELL_LIT0000002448		Singer Rebuttal ¶ 258
<b>118</b>	ND_0065243 - Nucciarone Ex. 03		Singer rebuttal ¶ 277
<b>119</b>	Transcript of M. Nucciarone Rule 30(b)(6) deposition, dated April 3, 2024	39:24-40, 230:10-22	Singer Rebuttal ¶ 268

Table of Long Report Exhibits

<b>Ex. No.</b>	<b>Document ID</b>	<b>Transcript Pincites</b>	<b>Cited in Expert Report ¶</b>
<b>7</b>	DARTMOUTH_0000359371		Long ¶ 184
<b>105</b>	NULIT-0000161662		Long ¶ 176 (passim)